UNITED STATES DISTRICT COURT

for the

		Middle District	of Nor	th Carolina		
United States of America v. STEPHEN JIKE WILLIAMS))))	Case No. 1:22N	1J <u>443</u>	
1	Defendant(s)					
		CRIMINAL	CON	IPLAINT		
I, the complair On or about the date(s)		tate that the follow 2 through 10/29/20	1041	true to the best of	my knowledge and belief. Guilford	_ in the
Middle Dis	trict ofNort	n Carolina , tl	ne defe	ndant(s) violated:		
Code Section		Offense Description				
18 U.S.C. §§ 115(a)(1)(B) and (b)(4)		Threatening to murder a Federal law enforcment officer with intent to impede, intimidate, or interfere, or with intent to retaliate against the officer				
18 U.S.C. § 875(c)		Transmitting in interstate commerce a communication containing a threat to injure the person of another				
This criminal of See attached Affidavit	complaint is based of Task Force Off		n.			
♂ Continued of	on the attached sh	eet.			(0)	
On this day, the applicant appeared before me via reliabelectronic means, that is by telephone, was placed under both, and attested to the contents of this Criminal Complaint and attached affidavit in accordance with the equirements of Fed. R. Crim. P. 4.1.				Complainant's signature Task Force Officer, FBI Printed name and title		
Date: 11/8/20			- gois	John Penli Judge's signature		
City and state:	Winston-Salem.	North Carolina		Joi Elizabe	th Peake, U.S. Magistrate Ju	dae

Printed name and title

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT AND CRIMINAL COMPLAINT

I, being duly sworn, hereby depose and state as follows:

INTRODUCTION

1. Your Affiant is employed as a

and has been so employed since 2004. I am currently assigned to the Charlotte Division, Greensboro Resident Agency Office of the Federal Bureau of Investigation as a Task Force Officer (TFO), and have been so since November 2012. In this capacity, I am authorized to investigate matters involving violations of federal law. I hold the Advanced Law Enforcement Certificate issued by the North Carolina Criminal Justice Training and Education Standards Commission.

2. As a Federal Task Force Officer, I am authorized to investigate violations of United States laws and to execute warrants issued under the authority of the United States. I have conducted and assisted with numerous investigations involving the commission of violent crimes, such as shootings, aggravated assaults, robberies, threats of mass violence, etc. Through instruction, training, experience, participation in investigations, and the exchange of information with other law enforcement agents and officers, I have become familiar with the manner in which people commit violent acts and the methods, language, and terms that are used to further their criminal activities.

- 3. The facts set forth in this affidavit are the products of the Affiant's investigation as well as the investigation of other law enforcement officers. The information in this affidavit is provided for the limited purpose of establishing probable cause. The information is not a complete statement of all the facts related to this case.
- 4. Based on your Affiant's training and experience and the facts as set forth in this Affidavit, there is probable cause to believe that violations of 18 U.S.C. §§ 115(a)(1)(B) and (b)(4), threatening to murder a Federal law enforcement officer with intent to impede, intimidate, or interfere, or with intent to retaliate against the officer, and 18 U.S.C. § 875(c), transmitting in interstate commerce a communication containing a threat to injure the person of another, have been committed by Stephen Jike Williams.

JURISDICTION

5. This court has jurisdiction to issue the requested arrest warrant based on a criminal complaint, pursuant to Rule 4(a) of the Federal Rules of Criminal Procedure.

RELEVANT STATUTES

6. 18 U.S.C. § 115(a)(1)(B) criminally punishes "Whoever . . . threatens to assault, kidnap, or murder . . . a Federal law enforcement officer . . . with intent to impede, intimidate, or interfere with such . . . law enforcement officer while engaged in the performance of official duties, or with intent to retaliate against such . . . law enforcement officer on account of the performance of official duties." A threat to

murder in violation of this section is punishable by a fine or imprisonment for a term of not more than 10 years, or both. 18 U.S.C. § 115(b)(4). A "Federal law enforcement officer" means any officer, agent, or employee of the United States authorized by law or by a Government agency to engage in or supervise the prevention, detection, investigation, or prosecution of any violation of Federal criminal law." 18 U.S.C. § 115(c)(1).

7. 18 U.S.C. § 875(c) criminally punishes "Whoever transmits in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another . . ."

PROBABLE CAUSE

8. On September 19, 2022, an employee with The Good Information Foundation¹ saw and reported to law enforcement an email sent the prior day from Stephen Williams via email address jike7XXXX@gmail.com.² The title of the email was "Cease and desist all operations." The body of the email reads as follows:

You are hereby ordered by we the people under the laws of the constitution to cease and desist all defamation and slander of Maga Republicans and Donald Trump. This is Treason an act of war and we will treat you accordingly. You have till the end of the month to print a retraction whistle blow on yourself or I will shut you down personally.

¹ Based on my review of publicly available information, I know that the Good Information Foundation is a non-profit organization created in 2021 to "tackle the growing information crisis in America that is undermining social trust, harming public health, and damaging the United States democracy. The mission of The Good Information Foundation is to increase the flow of good, factual information that will counter and rebut the misinformation and disinformation." See goodinfofoundation.org, last accessed on October 12, 2022.

² This email has been partially redacted by using XXXX to mask some of the numbers in the email address, which appear to correspond with Stephen Jike Williams's date of birth, to protect this personal identifiable information.

Lethal action will be necessary if any physical detainment is attempted when I shut you down. Leave peacefully or your children will forget who you are.

- 9. After receiving the email, personnel with The Good Information Foundation provided the email to their attorney, J.B. After that, J.B. provided the email to Special Agent (SA) of the Washington Field Office of the FBI. Based on the verbiage that lethal action would be taken if the business did not cease and desist all defamation and slander of MAGA³ Republicans and Donald Trump, an investigative assessment was generated by SA so further investigation could be done regarding the comments in the email and Williams's intent behind the comments.
- 10. Through law enforcement database searches, FBI personnel identified Stephen Jike Williams, date of birth X/XX/XXXX, residential address of Stokesdale, North Carolina, as being the individual that sent the email.⁴ FBI personnel also located the following photo for Williams in the North Carolina Department of Motor Vehicles database:

³ MAGA is an abbreviation for "Make America Great Again," the campaign slogan for Donald Trump's successful 2016 presidential campaign.

⁴ This Gmail account contains "Jike" in the email address, Williams's middle name, as well as his date of birth. Additionally, the contact detail with the email address was the name Stephen Williams.



- 11. On or about September 23, 2022, after determining that Williams resides in North Carolina, the Washington Field Office of the FBI forwarded the investigative assessment to the Greensboro Resident Agency Office of the FBI for further investigation.
- 12. On October 3, 2022, a female FBI Special Agent (SA) (hereinafter "Special Agent 1") and a male FBI Task Force Officer (TFO) (hereinafter "TFO 1") of the FBI's Greensboro Resident Agency, who are both sworn Federal law enforcement officers, whose responsibilities include the prevention, detection, and investigation of Federal criminal laws, attempted to interview Williams at his residence in Stokesdale, which is in Guilford County, within the Middle District of North Carolina. They were driving in an unmarked vehicle and were not wearing any clothing with law enforcement markings. TFO 1 and Special Agent 1 planned to approach Williams's residence utilizing the front door and conduct a knock and talk interview. The front door was accessible by walking from the driveway along a concrete pathway to the front porch. TFO 1 and Special Agent 1 parked behind Williams's truck in the center of the driveway approximately eighty-four feet from the house. There were no

gates or fences prohibiting entry on to Williams's property or driveway. There were no signs posted saying, "No Trespassing."

- Williams exit his front porch and run towards TFO 1's vehicle. He immediately shouted, "Why the fuck are you on my property?" Special Agent 1 identified herself as an FBI agent with her credentials, which instantly made Williams very angry, and he began yelling that the Department of Justice and the FBI hired a Russian agent to steal the election. Williams screamed multiple times, "Get the fuck off my property!" TFO 1 identified himself as being with the Guilford County Sheriff's Office. Williams briefly turned his attention to TFO 1, but then refocused his attention back on Special Agent 1 and kept screaming and spitting⁵ on her through the window of TFO 1's vehicle. Special Agent 1 asked Williams why he was so upset, and all Williams would do was lean in the window of TFO 1's vehicle and scream. TFO 1 advised Williams to stop spitting on Special Agent 1. Williams stepped back and continued being irate and hostile.
- 14. Williams called Special Agent 1 a "bitch" multiple times and stated TFO 1 should arrest Special Agent 1 and have her executed for treason and sedition. Williams stated to Special Agent 1, "I'm going to take you out." TFO 1 asked Williams to clarify what he meant by that comment. He told TFO 1 that "you know what I meant." TFO 1 advised if he was threatening to kill or harm a federal agent, he would

⁵ Williams was screaming in such a manner and in close proximity to Special Agent 1, that particles of saliva landed on her as he was screaming at her. "Spitting" as used in this affidavit has that meaning.

be charged for threatening a federal agent. Williams failed to explain whether he meant something other than killing or harming the federal agent and instead asked if Special Agent 1 or TFO 1 had a search warrant. TFO 1 and Special Agent 1 advised they did not have a search warrant, and Williams again said, "Get the fuck off of my property!" Williams continued screaming this, so Special Agent 1 and TFO 1 then left Williams's residence without conducting an interview regarding Williams's threat of lethal action in the email received by The Good Information Foundation (see supra Paragraph 8).

of The Good Information 15. On October 6, 2022, Special Agent 1 called Foundation and advised her that Williams was not interviewed due to his irate behavior. During their conversation, Special Agent 1 learned that Williams's email to The Good Information Foundation was in response to a TikTok video made by a social media influencer that was asked by The Good Information Foundation to produce anti-Trump rhetoric. In the video, the influencer exposed that The Good Information Foundation was paying influencers to post videos and requiring them to use preestablished talking points, one of which the representative of the Foundation could not provide any factual support for. told Special Agent 1 that The Good Information Foundation hired an outside company to hire social media influencers to create videos that aligned with their information and beliefs about former President Donald Trump. advised Special Agent 1 that The Good Information Foundation received multiple emails in response to the TikTok video, but Williams's email was the most egregious.

- 16. On October 7, 2022, the FBI National Threat Operations Center (NTOC) received a submission from a complainant named J.K. J.K. reported that they had observed a TikTok video in which a male subject was threatening to kill FBI agents. J.K. provided NTOC personnel a link to the TikTok video, and advised the video was posted approximately 17 hours before J.K. observed it. The link was uploaded to the investigative assessment already being investigated by the Greensboro Resident Agency of the FBI.
- 17. On October 8, 2022, Special Agent 1 contacted J.K. by phone about the TikTok video. J.K. resides outside the state of North Carolina. J.K. indicated they were very disturbed by the video and provided Special Agent 1 a screenshot from the video that showed the TikTok username to be "@jikewilliamsofficial." The screenshot clearly indicated the video J.K. was referring to was a video containing the threats made by Williams, which is described in the next paragraph.
- 18. On October 9, 2022, Special Agent 1 provided TikTok Inc. a preservation letter for the TikTok video posted by Williams. Your Affiant, along with other FBI personnel, reviewed the video and determined that Williams had posted a TikTok video regarding the encounter with the FBI on October 3, 2022. The video is entitled "Fuck the FBI." Williams said, "The FBI showed up at my house the other day, Monday, a female agent along with a Sheriff." Williams proceeded to make statements about how the FBI is corrupt, and all agents are considered to be "enemy combatants." The video lasted two minutes and eighteen seconds. The video appeared to be filmed in the living room of a residence, using a cell phone and posted with the

TikTok app. In the video, Williams made the following relevant statements in substance and in part:

FBI showed up at my house the other day, Monday. Female agent along with a sheriff—not packing like that—um, didn't have a warrant, asking me questions about e-mails that I sent

The FBI, at this point in time, has no jurisdiction. If they come to your home, point your weapon at them, open fire on them, and take them out. They are enemy combatants. By the Constitution, they are enemy combatants.

. . .

Wake up America. Listen, if the FBI—I told the FBI, if you come back, come hot. And if they try to surround my house like that, you tell that fat son of a bitch, Boy, you're a big fucking target. I got a fucking .308.6 I'll take that AK-47 from you when I'm done and use it to kill the rest of those motherfuckers and make it look like you did it.

I'm not playing with the fucking FBI. They've been put on fucking notice, if you step back foot on my fucking property, I ain't gonna sit there and talk to you. I'm going to bust your fucking head open with fucking .308s man. I'm going to kill every single one of you, stack you up in your cars and drive you back to headquarters and finish the fucking job.

Fuck the FBI. They are working with foreign agents, they are a corrupt organization, they have no jurisdiction, they have thrown us into basically World War III. We are literally now, at the precipice of World War III with Russia because of their corruption, their failure to investigate corruption, and they are complicit with the death of Ukrainians, of the United States Americans who are going over there and getting killed. They are absolutely out of control. Stand up to em, fight em, shoot em on sight.

⁶ Here, .308 appears to refer to a .308 caliber rifle. .308 caliber ammunition is commonly used in applications including military, law enforcement, competitive sport shooting, and hunting. This caliber is commonly used in rifles for long-range precision shooting.

19. Below is a screenshot from the video, clearly showing the subject in the video is Stephen Jike Williams:



- 20. TFO 1 reviewed the video, specifically the statements where Williams referred to a "fat son of a bitch" and "Boy, you're a big fucking target." TFO 1 was not sure who Williams was referring to since Williams's threats were primarily directed at FBI agents and TFO 1 identified himself to Williams as a sheriff's deputy.
- 21. On October 13, 2022, your Affiant located two TikTok videos posted by Williams utilizing username @jikewilliamsofficial. One video was titled "You're 100% right." The other video was titled "no they don't. it's irresponsible and unsportsmanlike, the chance of wounding is way too high." The following are details related to each video:

a. Video "You're 100% right":

This TikTok video shows Williams speaking in the living room of a residence, and the video appears to have been recorded in response to a comment posted by username domicky; however, that comment was not accessible. According to a timeline on the bottom portion of the screen, the video was posted two days prior, on October 11, 2022. In Williams's video, he agreed with what was said in the other video regarding the FBI. Williams said the FBI was at his house "last Monday, eight days ago." He stated the FBI did not know he had a fiancée but thought he was a single white male living in poverty, because he reduced his salary. Williams stated the FBI "came out with a female agent and a county sheriff, and they came out unarmed, which was their first mistake." Williams said he "punked" the FBI, "stood them down, kicked them out of the yard," told the FBI not to ever come back, and accused them of treason, sedition, and conspiracy to overthrow the government.

b. Video "no they don't. it's irresponsible and unsportsmanlike, the chance of wounding is way too high":

This TikTok video shows Williams speaking in what appears to be a garage area of a residence, and he is replying to a comment made by username 383obs1998. Your Affiant did not view that comment.⁷

⁷ The timeline on the bottom portion of the screen indicated the video was posted 3 days ago; however, your Affiant did not capture a screenshot until October 14. Therefore, this video appears to have been posted the same day as the other video, October 11.

It appears Williams was criticizing viewers for their criticism of a previous TikTok video related to long-range shooting. In Williams's video, he states the person in the original shooting video was probably shooting a .338, not a .308. Williams stated, "you better watch your mouth, I've trained with guys like this dude" (referring to the original shooting video) and "he can shoot better than you, he can shoot better than me." Based on Williams's comments in the video, Williams has training and knowledge of firearms.

- 22. On or about October 24, 2022, your Affiant observed another TikTok video posted by Williams. Your Affiant did not recall the name of the video, but while reviewing it, your Affiant heard Williams state (paraphrased) that the FBI was corrupt. He further stated that he did not want another "1776" but only wanted peace. Your Affiant attempted to download the video on October 31, 2022; however, your Affiant could not locate the video, most likely due to Williams's @jikewilliamsofficial account being suspended by TikTok.
- 23. On October 31, 2022, your Affiant reviewed other TikTok videos posted by Williams to determine if Williams had made any additional threats towards the FBI or other law enforcement personnel. Your Affiant located a video posted by Williams utilizing account @jikewilliams. The video was titled "On the back of you money the pyramid the saying underneath it says 'new world order' and the eye on top of the pyramid is for the Secret society." The video was posted two days prior, October 29, 2022. In the video, Williams stated he was in his garage, and it appeared he filmed the video using a cell phone and posted it using the TikTok app. He stated

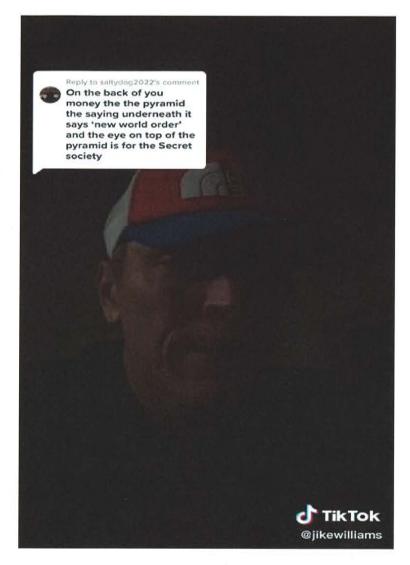
his accounts had been banned and the FBI came to his house on October 3rd. He then preceded to make the following threatening comments in substance and in part:

Listen to me. Stand fucking strong. Pull out your fucking weapons. Fight your federal agents. They left my home. Nobody died. Thank God. Thank God. But I stood'em down. And listen y'all, it's like this. These people wanna come over here and start fucking problems with people like me who was just telling the truth, like this lady. They say I'm crazy, right. [(The camera pans to a table that has something black in color lying on it.)] I'm not fucking crazy, I'm ready for a fucking fight. And I'm not ready to fucking go to Ukraine and fight Russia. I'm ready to shoot fucking FBI agents, CIA agents, and any federal law enforcement agent working for Joe Biden or anybody like Klaus Schwab . . . Australian police, any of them. Execute those motherfuckers on sight. If they wanna fucking de-populate, de-populate them.

You fu— . . . I-I-I love y'all on this TikTok shit, whatever, but they're gonna censor the truth. They're gonna shut you down. You're . . . you sound like you're in Europe. What the fuck is the CEO of Pfizer still doing fucking breathing? If I was in a hundred—a thousand yards of that motherfucker, he'd be spitting his fucking teeth out of his mouth. Cause I would shoot him with a three-oh-eight (.308) in the fucking mouth. TikTok is promoting vaccinations, which is death. But they won't—they won't let you—they won't let you put this motherfucker on here. Right? [(Williams holds what appears to be a handgun in a holster up to the camera.)] They won't let you pull—pull this this motherfucker out [(Williams picks up what appears to be a magazine for a semi-automatic rifle and holds it up to the camera)] and the rifles that are in my fucking— . . . they won't let me show you that, but they'll show you a fucking syringe that kills little kids in their sleep.

They wanna take away our weapons. They wanna take away our ability to communicate. And they wanna do it and they wanna watch y'all bitch and complain and watch me bitch and complain so they know where we're at when it's time to purge us. So, you damn well better start gettin' your fucking weapons ready, start calling your fucking government like I do . . . tell them motherfuckers where they can stick it, and dare'em to fucking bring a fight. And kill every fucking one of em that you can. Cause we should've did that to the Nazis in 1938, and we didn't. And a hundred million people died. Should've killed Hitler as soon as he took Munich. But you're fucking cowards and you're TikTok. Fucking fight man. Fight!

24. On October 31, 2022, your Affiant provided TikTok a preservation request for account @jikewilliams. A copy of the video was downloaded and preserved as evidence. Below is a screenshot from the aforementioned video:



25. Based on the above, your Affiant has established probable cause for the issuance of an arrest warrant, based on this criminal complaint for the violation of 18 U.S.C. §§ 115(a)(1)(B) and (b)(4), and 18 U.S.C. § 875(c), in that Stephen Jike Williams, told FBI Special Agent 1, "I'm going to take you out," and later transmitted in interstate commerce, and communicated via TikTok, two videos containing threats

to injure and murder FBI agents, specifically in response to the attempted interview on October 3, 2022, by FBI Special Agent 1, thus revealing an intent to threaten her and other FBI agents in retaliation for the performance of her official duties, or an intent to impede, intimidate, or interfere with FBI agents in the performance of official duties.

26. Based on the forgoing, your Affiant requests that the Court issue the proposed arrest warrant based on this criminal complaint.

Respectfully submitted,

<u>s/</u>

Task Force Officer Federal Bureau of Investigation

In accordance with Rule 4.1(b)(2)(A), the Affiant attested under oath to the contents of this Affidavit, which was submitted to me by reliable electronic means, on this _____ day of November, 2022, at _____ a.m./p.m.

Joi Elizabeth Peake

United States Magistrate Judge